

# Exhibit F

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
3                   CHARLESTON DIVISION

4   IN RE:   ETHICON, INC.,       :   Master File No.  
5   PELVIC REPAIR SYSTEM       :   2:12-MD-02327  
6   PRODUCTS LIABILITY         :   MDL 2327  
7   LITIGATION                 :   JOSEPH R. GOODWIN  
8                                 :   U.S. DISTRICT JUDGE  
9                                 :   \_\_\_\_\_  
10                                :   \_\_\_\_\_

11   THIS DOCUMENT RELATES TO :

12   TONYA and GARY EDWARDS,     :   Case No.  
13                                 :   2:12-CV-099972

14                   Plaintiffs   :

15                   vs.           :

16   ETHICON, INC., et al.       :

17                   Defendants     :

18   \_\_\_\_\_  
19   JO HUSKEY and ALLEN         :   Case No.  
20   HUSKEY,                     :   2:12-CV-05201  
21                                 :   \_\_\_\_\_  
22                                :   \_\_\_\_\_

23                   Plaintiffs   :

24                   vs.           :

25   ETHICON, INC., et al.       :

                 Defendants     :

18                   The deposition of DENISE M. ELSER, M.D., taken  
19   pursuant to the Federal Rules of Civil Procedure of the  
20   United States District Courts pertaining to the taking of  
21   depositions, taken before LISA H. BREITER, Certified  
22   Shorthand Reporter of the State of Illinois, at Yorktown  
23   Westin Hotel, 70 Yorktown Shopping Center, Boardroom,  
24   Lombard, Illinois, on April 24, 2014, at 9:15 a.m.  
25

1 available page, the Piet Hinoul.

2 Q Okay. So none of the e-mails in the  
3 production materials, correct?

4 A Correct.

5 Q Okay. And I forgot to ask you, but all of  
6 these materials that were sent to you were chosen by  
7 defense counsel, correct?

8 A On this list, yes.

9 Q In other words, you didn't ask for any of  
10 this? This is what they decided to give to you,  
11 correct?

12 A Correct.

13 Q Have you asked for any other internal  
14 materials?

15 A No.

16 Q Okay. Do you know what a clinical expert  
17 report is?

18 A No.

19 Q Do you know what a design failure modes  
20 effects analysis is?

21 A No.

22 Q Did you review any of the 510(k) documents?

23 A No.

24 Q Did you review any Abbrevio documents?

25 A Internal documents?